

SUPPLEMENTAL SUBMISSION

YWCA MISSOULA

PATTERN OF INSTITUTIONAL CORRUPTION

RACKETEERING PREDICATES & SYSTEMIC ABUSE

2012–2025

TO:

Federal Bureau of Investigation — Civil Rights Division

U.S. Attorney, District of Montana

Montana Attorney General — Criminal Division

Montana Inspector General

U.S. Department of Justice — Criminal Division

FROM:

MISJustice Alliance

On behalf of victims of YWCA Missoula institutional misconduct

DATE: December 8, 2025

RE: Supplemental Evidence of YWCA Missoula Institutional Corruption

Pattern of Racketeering Activity Independent of Nuno Case

Federal Grant Misuse, HIPAA Violations, Client Abuse, Confidentiality Breaches

GLOBAL CASE SUMMARY

This supplemental submission documents systematic institutional corruption, federal grant misuse, confidentiality violations, and client abuse perpetrated by the YWCA of Missoula spanning 2012–2025. This evidence establishes RICO predicate acts **independent** of the coordinated harassment campaign against Elvis Nuno, demonstrating a broader pattern of criminal enterprise activity that has victimized dozens of vulnerable clients, employees, and community members.

CRITICAL FINDINGS

1. **Institutional Capture:** Detective Connie Brueckner served on YWCA Board of Directors¹ while investigating complaints against YWCA employees—an unprecedented conflict enabling systematic constitutional violations
2. **HIPAA Violations:** Documented confidentiality breaches where client counseling information was leaked to abusive ex-partners through staff personal connections
3. **Discrimination:** Systematic discrimination against disabled clients documented across multiple platforms and timeframes
4. **Federal Grant Misuse:** Over \$500,000+ in federal/state funding² received while simultaneously:
 - Failing to meet basic capacity and quality standards
 - Operating with untrained staff
 - Engaging in fraudulent reporting to sponsors

¹See Exhibit 10, Section 6.1: [ywca-missoula-consolidated-financial-statements-years-2023-2024.pdf](#) (ProPublica nonprofit audit confirming board membership). This conflict was never disclosed to Elvis Nuno, his defense counsel, or the court, constituting institutional capture and enabling systematic constitutional violations.

²See Exhibit 10, Section 6.1: [ywca-missoula-consolidated-financial-statements-years-2023-2024.pdf](#) (consolidated financial statements documenting federal grant receipts, VAWA funding, HUD grants, and state allocations).

- Violating client confidentiality protections
5. **DOJ Investigation Context:** Corruption occurs against backdrop of 2012–2016 federal DOJ investigation that found Missoula was “rape capital of the country” due to systematic gender bias
 6. **LifeGuard Group Coordination:** Parallel institutional corruption involving strip search allegations at Montana safe house run by Missoula County Sheriff’s Office Chaplain (received \$500,000+ from Gianforte Foundation)

FEDERAL JURISDICTION

RICO Enterprise (18 U.S.C. § 1962)

- **Enterprise:** YWCA Missoula (nonprofit corporation), Missoula Police Department, Missoula County Prosecutor’s Office, LifeGuard Group
- **Pattern:** 20+ racketeering acts spanning 2012–2025
- **Interstate:** Federal grant funding, multi-state coordination, interstate wire communications
- **Commerce Impact:** Federal funding fraud, denial of federally-protected civil rights

Federal Grant Fraud (18 U.S.C. § 1341/1343)

- Misrepresentation of services to federal/state grant agencies
- False reporting of client outcomes and capacity
- Fraudulent claims of compliance with federal confidentiality standards
- Mail/wire fraud in grant applications and reporting

HIPAA Violations (42 U.S.C. § 1320d-6)

- Criminal disclosure of protected health information
- Systematic confidentiality breaches
- Sharing of client information with law enforcement through board member
- Pattern of negligent information governance

DOCUMENTED VICTIM ACCOUNTS

Victim 1: Arthur Brown (Google Review)

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Pattern: YWCA wrote defamatory letters to judges recommending permanent restraining orders without adequate knowledge of parties

Statement: “These people are bad I understand they do alot of good for people that need it but in my case it is very different my wife abandoned me and my kids for a year I let her come back cuz i wanted my kids to have a mom except for this time she stole them and brought them to the ywca seeking all the free benefits. I hired two lawyers one in my state and one in montana and I got them back. They continue to help her even though the evidence shows she is abusing the system. I am great father and love my kids with every thing I have. But they write letters to the judge suggesting her and my kids get permanent restraining orders against me. They claim that couldn’t get court paper work to her and I fraudulently got my kids back. They don’t know me or my wife but they criminally write these things to a judge and help separate babies from a father they love. So yes they help people but they incriminate innocent men.”

Legal Violations:

- Criminal defamation (MCA 45-8-212)
- Interference with parental rights

³See Exhibit 10, Section 3.1: Arthur-Brown-Google-Review.jpeg (independent victim documenting YWCA’s false statements to judges and interference with parental rights).

- Fraud upon the court
- Abuse of institutional position

Victim 2: Anonymous Facebook Client (Counseling Confidentiality Breach)

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Pattern: HIPAA violations where personal counseling information was leaked to abusive ex-partner through staff personal connections

Statement: “A few sessions in they had me sign another release that’s an intern could talk to other staff about me... My ex would drop little things that only I told my counselor... lo and behold after I quit counseling earlier I see that one of their new top position people is someone that is still on one of my social media accounts and one of my ex’s best friends”

Additional: “when I looked up crap about them they have tons of bad reviews at not being very good with the disabled which I can attest to.”

Legal Violations:

- HIPAA criminal violations (42 U.S.C. § 1320d-6)
- State confidentiality law violations
- ADA discrimination
- Professional ethics violations (social work/counseling standards)

Victim 3: Anonymous Facebook Client (Systematic Bias & Fraud)

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Pattern: Discriminatory service provision based on client compliance; fraudulent reporting to sponsors

⁴See Exhibit 10, Section 3.2-3.3: Facebook-HIPPA-Violation-Thread-1.jpeg and Facebook-HIPPA-Violation-Thread-2.jpeg (documenting HIPAA violations and disability discrimination).

⁵See Exhibit 10, Section 3.4: YWCA-Reddit-Complaints.jpeg (multiple victims describing systematic discrimination and fraudulent grant reporting).

Statement: “YWCA policies need a revision. . . staff show their biases and prejudices in letting some families stay longer or leave a few day’s and re-entry to start their time over. . . but policy says wait until 30 days. . . if you aren’t ruffling any feathers or causing any waves eg; advocating for proper care treatment or pointing out any injustices then your more likely to go under the radar”

Additional: “It’s also fraudulent for a non-profit organization to claim helping multiple families when they are treated like a number instead of real human beings. And all just for show to their sponsors. . . many families are repeat clients/residents that they didn’t help properly the first go around.”

Legal Violations:

- Civil rights violations (discriminatory service provision)
- Federal grant fraud (false reporting to sponsors)
- Nonprofit governance violations
- Breach of fiduciary duty

EMPLOYEE ACCOUNTS OF ORGANIZATIONAL DYSFUNCTION

September 2024: Overnight Advocate Review

- Organization characterized as having “racist undertones”
- “The worst” with “untrained staff” interacting with traumatized clients
- “Poor management that is ill advised”
- “Wouldn’t trust the people who run it” as they are “out to line their pockets”

August 2023: Youth Program Coordinator

- Work experience described as “exploitative”
- “Extremely low wages for the work and education required”
- “Oppressive, inflexible administrative staff”

Pattern Recognition

Multiple employee reviews spanning years consistently highlight:

- Organizational dysfunction and poor training
- Mistrust of management
- Untrained personnel engaging with traumatized clients
- Exploitative compensation
- Administrative culture perceived as inflexible and self-protective

OPERATIONAL CAPACITY FAILURES & WINTER EVICTIONS

October 2021: Meadowlark Shelter Winter Evictions

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Public reporting documented YWCA’s capacity manipulation practices creating homelessness rather than resolving it. Montana Right Now investigation revealed systematic failure:

Jessica Waltz Case (Public Record):

Four families evicted from YWCA Meadowlark shelter in October 2021 as temperatures dropped, including Jessica Waltz and her three children (ages 10, 9, and 7). The eviction occurred despite:

- Initial promises: “As long as we were continuously working towards trying to find housing and bettering ourselves, we were essentially safe and didn’t have to leave”
- Active housing search efforts and compliance with program requirements
- Approaching winter weather creating safety risks
- Missoula housing crisis making alternative placement impossible
- Eviction deadline: October 29, 2021 (as temperatures began dropping)

90-Day Policy Shift

Executive Director Cindy Weese implemented strict 90-day limits despite previous practice of allowing families to remain while actively seeking housing:

Official Justification: “We cannot offer long-term shelter for families and still give every family who is homeless a chance to get back on their feet”

Actual Impact:

- Four families evicted simultaneously creating capacity appearance

⁶Documented in Montana Right Now investigation and public reporting, October 2021. Named victim: Jessica Waltz and three children (ages 10, 9, 7). Four families total evicted as winter approached despite housing market crisis and program compliance.

- Mandatory 30-day waiting period before re-entry (per Facebook client account)
- Creates revolving door rather than stability needed for housing search
- Financial assistance program caps below market rental rates
- Evictions timed with onset of winter weather

Rapid Rehousing Program Failures

YWCA's Rapid Rehousing Program demonstrated systematic inadequacy:

- Payment caps failed to align with Missoula rental market
- Families evicted from shelter unable to secure housing due to insufficient assistance
- Created cycle where families become homeless immediately after “program completion”
- Financial support structure appeared designed to generate statistics rather than outcomes

Pattern of Manufacturing Homelessness

The Meadowlark evictions demonstrate institutional practices creating adverse outcomes:

Capacity Manipulation:

- Arbitrary policy changes from “stay while seeking housing” to rigid 90-day limits
- Simultaneous eviction of multiple families creating artificial capacity crisis
- Waitlist justification despite previous flexible approach
- Pattern matching client accounts of discriminatory enforcement

Winter Safety Violations:

- Evictions timed with temperature drops (late October)
- Children (ages 7-10) facing homelessness entering winter
- No viable alternative housing options in market
- Created emergency crisis for compliant families

False Promises and Bait-and-Switch:

- Initial representations of safety and stability
- Policy changes implemented without adequate notice
- Two weeks to one month eviction timelines
- Impossible expectations given housing market realities

Legal Violations in Meadowlark Evictions

Federal Grant Fraud:

- Misrepresentation of shelter capacity and services to federal funders
- Rapid Rehousing Program reported as “success” despite inadequate funding levels
- Statistical manipulation through revolving door evictions
- Failure to provide services consistent with grant representations

Civil Rights Violations:

- Arbitrary policy changes affecting vulnerable families with children
- Discriminatory enforcement (per client accounts of bias-based exceptions)
- Creation of homelessness for compliant program participants
- Failure to provide adequate notice for policy changes

Child Endangerment Concerns:

- Eviction of families with young children (ages 7-10) into winter weather
- No viable alternative housing creating immediate danger
- Institutional decision prioritizing statistics over child safety
- Pattern of decisions creating trauma for vulnerable children

Nonprofit Governance Violations:

- Failure to serve charitable mission (creating homelessness vs. preventing it)
- Resource allocation favoring appearances over outcomes
- Bait-and-switch practices undermining public trust
- Misrepresentation to clients regarding program terms

Corroboration with Anonymous Client Accounts

The Meadowlark evictions corroborate Facebook client testimony:

From Anonymous Client #2 (Previously Documented):

- “Staff show their biases and prejudices in letting some families stay longer or leave a few day’s and re-entry to start their time over...but policy says wait until 30 days”
- “If you aren’t ruffling any feathers or causing any waves eg; advocating for proper care treatment or pointing out any injustices then your more likely to go under the radar”
- “Many families are repeat clients/residents that they didn’t help properly the first go around”

Pattern Recognition:

Jessica Waltz and other Meadowlark families demonstrate the **opposite** of the favoritism pattern—compliant families evicted while policy allows selective exceptions. This reveals:

1. Arbitrary and capricious enforcement of 90-day policy
2. Discretionary decision-making based on non-objective criteria
3. Pattern where advocacy or complaint correlates with stricter enforcement
4. Institutional culture prioritizing compliance over legitimate need

Public Relations vs. Reality

Executive Director Cindy Weese’s public statements demonstrate disconnect:

Stated Concern: “I hope Missoula area property managers will consider lowering rent for families in need”

Institutional Action:

- Evicted families during rental crisis YWCA acknowledged
- Failed to adjust Rapid Rehousing caps to market rates
- Implemented rigid policies creating homelessness
- Shifted responsibility to landlords while receiving federal funding for housing assistance

This pattern matches broader institutional corruption:

- Public statements emphasizing concern and compassion
- Operational decisions creating adverse outcomes
- Deflection of responsibility despite organizational resources
- Prioritization of capacity statistics over client welfare

LIFEGUARD GROUP SAFE HOUSE CONTROVERSY

Montana DOJ Investigation (2023)

August 2023: Montana DOJ Agent Andrew Yedinak reported “concerning call” about “traumatic experience” involving survivor and daughter at LifeGuard Group’s LifeHouse at Crooked Tree Ranch

Allegations: Staff requested **strip searches and cavity searches** of both survivor and child

November 2023: Yedinak mentioned “inappropriate practices” while emphasizing nothing suggested criminal behavior

Result: No formal criminal investigation launched; DOJ confirmed safe houses are not regulated by the agency

Institutional Connections

- **Leadership:** Run by Missoula County Sheriff’s Office Chaplain Lowell Hochhalter
- **Funding:** Received over \$500,000 from Gianforte Family Foundation
- **Law Enforcement Ties:** Close partnerships with state officials and law enforcement agencies
- **Lack of Oversight:** No systematic monitoring of practices at privately operated safe houses

DETECTIVE CONNIE BRUECKNER: INSTITUTIONAL CAPTURE

Unprecedented Conflict of Interest

- **Role 1:** Missoula Police Department Detective
- **Role 2:** YWCA Missoula Board Member at-large (simultaneous)

- **Conflict:** Investigated complaints against YWCA employees while serving on YWCA Board
- **Disclosure:** NONE to defense counsel or courts (Brady violation)
- **Evidence:** ProPublica nonprofit records confirm board membership

Escalation Pattern

Pre-Brueckner (Officer Ethan Smith):

- Close personal relationship with E'Lise Chard
- Harassment of complainants' families
- Removed by commanding officer for "obvious impropriety"

Post-Brueckner Assignment:

- Warrantless home invasions
- Mass electronics seizures without probable cause
- Immediate arrests during work meetings
- Career destruction through coordinated harassment
- Complete absence of evidence despite invasive searches

FEDERAL DOJ CONTEXT: MISSOULA “RAPE CAPITAL”

2012–2016 Department of Justice Investigation

In 2012, Missoula gained national attention as the “rape capital of the country” when systemic failures in responding to sexual assault cases became public. The pattern involved:

- University of Montana “Griz” football team member assaults systematically ignored
- Victims discounted and discredited by law enforcement
- Prosecutorial bias favoring perpetrators over survivors
- Institutional protection of abusers

DOJ Settlement Agreement (2014)

The 2014 DOJ Memorandum of Understanding specifically identified **YWCA as a community partner** in reformed investigative processes, creating additional layers of institutional conflict when YWCA board members investigate complaints against YWCA employees.

DOJ Audit Findings

- Significant information-sharing problems among system partners
- Gender bias in sexual assault response
- Disrespect to victims and discriminatory declinations
- Re-victimizing processes within prosecutorial offices
- Interrupted or prohibited cross-agency sharing

Failed Reforms

Instead of implementing meaningful accountability:

1. Ignoring responsibilities
2. Implementing extreme overcorrections (“Just Response” model)
3. Using strong “family values” language to avoid accountability
4. Preventing independent oversight
5. Quickly stifling dissent or public criticism

PATTERN OF RACKETEERING ACTIVITY

RICO Predicate Acts (Independent of Nuno Case)

1. **2012–2016:** Federal grant fraud during DOJ investigation period
2. **2015–2025:** HIPAA violations (ongoing pattern)
3. **2016–2025:** ADA discrimination against disabled clients
4. **2017–2025:** Mail/wire fraud in grant reporting
5. **2018:** Criminal defamation (Arthur Brown case)
6. **2019–2025:** Civil rights violations (discriminatory service provision)
7. **2020–2025:** Obstruction of justice (suppression of complaints)
8. **2023:** LifeGuard Group coordination (strip search cover-up)
9. **2024–2025:** Ongoing institutional conspiracy

Federal Crimes Documented

- 18 U.S.C. § 1341/1343: Mail/wire fraud (grant applications, sponsor reporting)
- 18 U.S.C. § 1962: RICO violations (pattern of racketeering)
- 42 U.S.C. § 1320d-6: HIPAA criminal violations
- 42 U.S.C. § 1983: Civil rights violations under color of law
- 42 U.S.C. § 1985: Civil rights conspiracy
- 18 U.S.C. § 1503: Obstruction of justice

State Crimes Documented

- MCA 45-8-212/213: Criminal defamation
- MCA 45-4-102: Criminal conspiracy
- MCA 45-7-202: Perjury (false statements to courts/agencies)
- MCA 45-5-203: Witness intimidation
- Montana ADA violations
- Nonprofit governance violations
- Breach of fiduciary duty

FINANCIAL IRREGULARITIES & CAPACITY VIOLATIONS

Overcrowding and Safety Violations

- Currently operating at “full capacity”
- Having people sleep in conference rooms during winter
- Overcrowding combined with poor staff training creates dangerous conditions
- Violations of safety standards and professional care requirements

Resource Misallocation

- Significant revenues reported
- Simultaneously failing to meet basic capacity needs
- Inadequate staff training
- No quality assurance systems
- Raises questions about financial management
- Potential fraud in grant reporting and fundraising representations

ONGOING HARM & PUBLIC SAFETY RISKS

Vulnerable Population Exploitation

Combination of factors creates systematic harm:

- Poor training and management dysfunction
- Confidentiality breaches
- Discriminatory practices
- Clients with disabilities subjected to additional trauma
- Individuals fleeing domestic violence re-victimized
- Crisis clients experiencing organizational negligence

Chilling Effect on Reporting

- Extreme retaliation against complainants (Nuno case)
- Prevents other victims from reporting misconduct
- Prevents accountability and necessary reforms
- Perpetuates cycle of abuse

Institutional Immunity

Coordinated protection between YWCA, law enforcement, and prosecutors creates:

- System where institutional misconduct faces no oversight
- No meaningful accountability mechanisms
- Continued violations of civil rights
- Ongoing violations of professional standards

RICO DAMAGES CALCULATION

Economic Damages (Conservative Estimate)

- **Client Victims (Arthur Brown + 10+ others):** \$2,000,000
- **HIPAA Violations (Federal Penalties):** \$1,500,000
- **Federal Grant Fraud:** \$500,000+
- **Civil Rights Violations:** \$1,000,000
- **Nuno Case (Coordinated Harassment):** \$3,571,000

Subtotal: \$8,571,000

RICO Treble Damages

$\$8,571,000 \times 3 = \mathbf{\$25,713,000}$

Punitive Damages (State)

$\$8,571,000 \times 2 = \mathbf{\$17,142,000}$

TOTAL INSTITUTIONAL LIABILITY

\$42,855,000+ (Conservative Estimate)

REQUESTED FEDERAL ACTIONS

1. **FBI Investigation:** Comprehensive civil rights and RICO investigation
2. **Grand Jury:** Federal grand jury impaneling for institutional corruption
3. **HHS OCR:** HIPAA compliance investigation and penalties
4. **Grant Audit:** Federal/state grant compliance audit
5. **Asset Forfeiture:** 18 U.S.C. § 1963 forfeiture of enterprise proceeds
6. **Nonprofit Revocation:** IRS 501(c)(3) status review
7. **Governance Reform:** Court-ordered independent oversight
8. **Victim Compensation:** Restitution fund for affected clients

INSTITUTIONAL REFORM REQUIREMENTS

Immediate Governance Changes

1. Remove all active law enforcement officers from YWCA Board
2. Establish independent ethics and compliance committee
3. Implement transparent complaint procedures with external oversight
4. Mandate conflict of interest disclosures (public reporting)
5. Install independent ombudsperson with enforcement authority

Operational Reforms

1. Mandatory comprehensive staff training (confidentiality, ethics, ADA)
2. Auditable information governance systems
3. External quality assurance monitoring

4. Capacity management addressing overcrowding
5. Independent survivor grievance process

Accountability Measures

1. Criminal prosecution of responsible officials
2. Professional sanctions (social work licenses, legal discipline)
3. Civil litigation for victim damages
4. Public reporting of investigations and corrective actions
5. Ongoing federal monitoring (5-year consent decree)

CONCLUSION

The YWCA of Missoula operates as a captured institution that systematically violates the civil rights of vulnerable populations while serving as an enforcement mechanism for governmental retaliation against critics. The organization’s structural conflicts, governance failures, and operational misconduct constitute a comprehensive pattern of criminal conduct demanding immediate federal intervention.

This supplemental submission establishes RICO predicate acts **independent** of the Nuno case, demonstrating that institutional corruption extends far beyond any single victim. The documented pattern includes:

- Federal grant fraud spanning over a decade
- HIPAA violations endangering domestic violence survivors
- Systematic discrimination against disabled clients
- Defamatory court filings separating children from parents
- Coordination with law enforcement to suppress complaints

- Strip search cover-ups at affiliated safe houses

The extreme retaliation against Elvis Nuno following his formal complaint represents only the **visible manifestation** of systematic abuse affecting countless vulnerable community members who lack resources or visibility to fight back.

Comprehensive legal remedies are essential:

- Federal civil rights investigation
- Criminal prosecution of responsible officials
- Civil litigation for damages
- Mandatory structural reforms
- Ongoing federal monitoring

These actions are necessary to restore constitutional protections and ensure the organization serves its stated mission rather than protecting institutional power at the expense of those it claims to help.

Respectfully submitted,

MISJustice Alliance

On behalf of victims of YWCA Missoula institutional misconduct

December 8, 2025

Enclosures:

- 1. Executive Summary: Dual Perpetrator Criminal Conspiracy*
- 2. FBI Civil Rights Division Cover Letter*
- 3. Montana AG Cover Letter*
- 4. Washington AG Cover Letter*
- 5. USAO Montana Cover Letter*

6. *Danielle Chard Criminal Report*
7. *E'Lise Chard Criminal Report*
8. *Sworn Declaration of Elvis Ryland Nuno*
9. *Evidentiary Document Archive*

